

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA

v.

JAMES MAHON IV,

Defendant.

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Case No. 3:24-CR-158

**DEFENDANT JAMES MAHON IV'S
FOURTH MOTION TO CONTINUE**

Defendant, James Mahon IV ("Mr. Mahon"), by and through undersigned counsel, hereby respectfully requests that this Honorable Court grant a 90-day continuance of the trial in this matter, which is currently scheduled to begin on July 7, 2025. In support of his motion, Mr. Mahon states as follows:

1. On June 25, 2024, the Government obtained an Indictment in this case.
2. Trial in this matter is scheduled to begin on July 7, 2025 [ECF 59].
3. Undersigned counsel for Mr. Mahon is currently scheduled for trial on June 30, 2025, before this Court and will require more time to prepare for trial in this matter.
4. Furthermore, due to the large volume of the discovery received in this matter, undersigned counsel for Mr. Mahon will require more time to review the discovery, conduct their own investigation and prepare for trial.
5. A failure to grant a continuance would deny undersigned counsel the reasonable time necessary for effective preparation, due to counsel's need for more time to review the evidence, consider possible defenses, and gather evidence material to the defense, as set forth in 18 U.S.C. § 3161(h)(7)(B)(iv).

6. Failure to grant a continuance would further likely result in a miscarriage of justice, as set forth in 18 U.S.C. § 3161(h)(7)(B)(i).

7. The additional time requested is a reasonable period of delay, particularly in view of the complex nature of the case—which apparently involves many years and a large number of witnesses. Counsel requires more time to prepare for trial, to investigate the matter, to gather evidence material to the defense, and to consider possible defenses.

8. Counsel for the Government does not oppose the request for a continuance.

For the foregoing reasons, Defendant James Mahon IV respectfully requests that the Court grant his motion and continue the trial for 90 days.

Dated: April 18, 2025

Respectfully Submitted,

/s/ Dennis E. Boyle

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Counsel for Defendant James Mahon IV

CERTIFICATE OF SERVICE

I hereby certify that on this 18th day of April, 2025, I electronically filed the foregoing with the Court using the CM/ECF system which served a copy on all parties.

/s/ Dennis E. Boyle

Dennis E. Boyle